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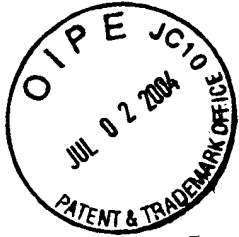
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PATENTS

AF/CFW  
2/42  
VB

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of: Joel Lesser

Examiner: T. Vu

Serial No.: 09/605,127

Group Art Unit: 2142

Filed June 28, 2000

For: SEMI-AUTOMATED LINKING AND HOSTING  
METHOD

**BRIEF ON APPEAL**

Commissioner of Patents and Trademarks  
Arlington, Virginia 22313-1450

Sir:

Further to the Notice of Appeal filed May 11, 2004, herewith are three copies of Appellants' Brief on Appeal. The statutory fee of \$165 for the Notice of Appeal fee has been paid and enclosed is \$165 for the submission of the appeal brief. Please charge any additional fee or credit any overpayment to Deposit Account No. 13-3403. Three copies of this page are attached for this purpose.

**I. PRESENTATION OF THE APPEAL**

**A. Real Party in Interest**

The real party in interest is Appellants' assignee, Creative NetVentures, Inc., a Georgia corporation with its principal place of business at 270 Westbury Lane, Atlanta Ga., 30005-2518.

### **B. Related Appeals and Interferences**

There are no related appeals and interferences.

### **C. Status of Claims**

At the time of the final Office Action, claims 1-15 were pending in the application. However, the application was initially filed with 14 claims. Claim 15 was added as a new claim with the response filed August 4, 2003 and resubmitted December 5, 2003 subject to a Notice of Non-Compliant Amendment dated December 2, 2003.

A copy of the claims subject to this appeal appears in Appendix A.

### **D. Status of Amendments**

No proposed amendments have been proposed or entered after final.

### **E. Summary of Invention**

Most generally, the present invention relates to a method for the semi-automated creation, maintenance, and management of links on subscriber websites utilizing a service website, upon which the invention resides. (Page 1, lines 4-6). More specifically, the claims relate to a method of verifying the existence of a link between an account Owner's link page and a Webmaster's site and a second link from the Webmaster's site to the account owner's site (Claim 1), a method of establishing a link between a link page of an account Owner and a site controlled by a Webmaster using and administrator (Claim 5), and a method of hosting a Web page to provide autorotation of links according to a formula. (Claim 11).

Website managers normally desire to increase traffic to their website. (Page 1, lines 30-31). One way to achieve increased traffic is to mutually agree with another website manager of another site to include links to each other's websites. (Page 1, line

31- Page 2, line 1). In the prior art, one webmaster, Webmaster B, would contact another webmaster, Webmaster A, after becoming interested in establishing a reciprocal links with Website A. (Page 2, line 11). An e-mail would be sent, Webmaster A would determine if he/she had an interest in such an arrangement with Website B, the Webmasters would agree and the Webmasters would separately provide the links. (Page 2, lines 12-21).

U.S. Patent No. 5,995,099 describes a prior art method of creating and maintaining page links between websites. (Page 3, lines 8-9). Links between Webmasters A and B are taught to be performed without any intervention from the Account owner. (Page 3, lines 9-12). This process is believed to not always be in the interest of one of the owners. (Page 3, lines 16-17). Furthermore, although the '099 Patent teaches one method of verifying that a link still corresponds to an active site, it performs this method as will be explained below, differently than the claimed method. (Page 4. lines 7-8).

According to the present invention, when a Webmaster **14** learns of link page **16** controlled by an account owner **12** to which the Webmaster would like to establish a first link **52** at a first link page **16**, he/she solicits the administrator **10**. (Page 6, lines 19-21). The solicitation may be performed by activating an add-link button **24**. (Page 7, lines 1-2). The administrator **10** creates a database entry **46** in a database **48** (Page 7, lines 14-15) and notifies the account Owner of the Webmaster's desire. (Page 7, lines 19-20). A queue **56** is presented to the account Owner including at least some of the information provided to the administrator **10** by the webmaster **14** including the first link information **30** and preferably a queue link **62** and accept and decline buttons **58,60**. (Page 7, line 21-

Page 8, line 2). If any of the proposed links **56** are accepted at step **70**, then the administrator **10** adds the first link **52** to the account owner's link page **18**. (Page 8, lines 4-5).

The administrator orders first link **52** relative to other first links **72,73**, if added. (Page 8, lines 11-12). Links **52,72,73** may be alphabetized or otherwise ordered. (Page 9, lines 1-2). When at least two first links **52,72,73** are displayed, the account Owner may be provided with the opportunity to autorotate the first links **52,72,73** in accordance with a formula . (Page 9, lines 8-12). This has been found helpful to display links at different locations so that the links may vary in exposure. (Page 9, lines 19-20).

A method of verifying links (i.e., checking for dead links) is also taught as being performed by the administrator **10** . (Page 10, lines 9-14). . The administrator **10** looks at a Webmaster's database entry **46** of first links **52,72,73** to locate the Webmaster's URL address **34**. (Page 11, lines 5-11). The administrator **10** then determines if the website **22** exists. (Page 11, line 7). Reciprocal link checking in the preferred embodiment is performed by spidering by downloading pages until the link is found at the Webmaster's URL address **34**. (Page 11, line 20 – Page 12, line 1). The spider also "looks" to see if this Webmaster's site **164** has been linked to somewhere by another site **22** by a second link **90**. (Page 12, lines 3-4) A message is sent to the account Owner **12** from the administrator **10** if a dead link or no site is found. (Page 11, lines 9-10).

#### **F. Issues**

1. Whether the Examiner properly rejected claims 1-15 as being anticipated by Horstmann, U.S. Patent No. 5,995,099 in the Final Office Action.

2. Whether the Examiner properly rejected claims 1-4 as obvious over Horstmann in view of Kredo, U.S. Patent No. 6,449,363 in the First Office Action.

3. Whether the Examiner properly rejected claims 5-10 as obvious over Horstmann in view of Mellquist, U.S. Patent No. 6,115,545 in the First Office Action.

### **G. Claims**

1. Claims 1-4 stand or fall together and they should be considered together.

2. Claims 5-10 stand or fall together and they should be considered together.

3. Claims 11-15 stand or fall together and they should be considered together. Claim 12 has an additional ground for allowance, as does claims 13 and 14. Each of these claims should be separately addressed on the additional scopes of coverage claimed.

## **II. ARGUMENT**

### **A. Anticipation of Claims 1-15 Based on Horstmann, U.S. Patent No. 5,995,099**

#### **1. Anticipation Rejection of Claims 1-4**

The method of claim 1 essentially provides four steps:

- (a) retrieving first link information from a database;
- (b) determining whether the first link information corresponds with an existing resource at the Webmaster's site using the link information to access the Webmaster's site; then
- (c) spidering through the Webmaster's site beginning at the link address; and

(d) verifying through the spidering step that a second link information is present on the Webmaster's site (the second link information corresponds to the link from the Webmaster's site to the Owner's site).

In the First Office Action dated May 22, 2003, the Examiner acknowledged: **“Horstmann does not teach (c) spidering through the Webmaster's site beginning at the link address”**. (Emphasis added). In that Office Action, the Examiner then combined Horstmann with Kredo, U.S. Patent No. 6,449,636 to formulate an obviousness rejection. As explained in part (B) below, the Applicant maintains that the obviousness rejection is also improper. The Kredo reference appears to identify a Web spider and the process of spidering as is known in the art. The Applicant was surprised to receive an anticipation rejection for claims 1-4 after the Examiner had acknowledged that Horstmann lacked an element of claim 1 in the First Office Action.

Following the May 22, 2003, Office Action, the Applicant narrowed the scope of claim 1 to require the second link information correspond to the link from the Webmaster's site to the Owner's site in step (d), and changed step (b) to require the first link information to be obtained from the database, and then performing step (c) after step (b). Step (d) was further narrowed to require the verification to occur through the spidering step. No broadening of claim 1 occurred with the amendment to claim 1 following the May 2003 First Office Action.

In the Final Office Action dated February 11, 2004, the Examiner cites column 6, lines 41-57 of Horstmann: “to begin the method, the links software or **spidering** step fetches the first link of the first page”(emphasis added). In May 2003, it appeared that the Examiner understood the meaning of spidering as it is known in the art.

Unfortunately, it now appears that the Examiner has applied a different interpretation of the term “spider” than provided by the Applicant, and as is known in the art, to the prejudice of the Applicant.

Column 6, lines 41-57 of Horstmann as relied on by the Final Office Action provide:

In embodiments wherein a number of links pages are stored on a single server, the links software associated with that server may be configured to periodically perform the method of FIG. 7 for example every Sunday night at midnight. Once the method is started, the links software accesses the server that includes the links pages to be checked. (This server may include a single links page or any number of links pages belonging to one or more sites) To begin the method, the links software fetches the first link of the first page to be checked (step 72). Then, in step 73, the links software exercised the link to insure that the link addresses an existing page. If the page does not exist, the method moves to step 74, in which the links software sends an e-mail message to the owner of the entity to which the link was directed. The email message identifies the defective link and notifies the owner that the link is being deleted. The link is deleted in step 75.

The method of Horstmann teaches the retrieving of first link from link pages to be checked, and then “exercis[ing] the link to insure that link addresses an existing page”.

There is no spidering as claimed by claim 1, and there are a number of problems with this rejection.

First, when the Office Action states: “to begin the method, the links software or spidering step fetches the first link of the first page”, the Examiner ignores the word “**then**” which requires the spidering step to occur after determining whether the first link information corresponds to an existing resource at the Webmaster’s site by accessing the Webmaster’s site using the first link information retrieved from the database.



Second, there is no spidering taught or suggested in Horstmann. As acknowledged in the First Office Action, through reference to Kredo, a spider examines a particular website and generates search-engine text indices for all significant terms made available for access by those Websites. (Kredo, Col. 1, lines 39-42). The process of using a spider to search for the term "Nortel" is described in Kredo at Col. 5, lines 29-38.

Third, step (d) is not taught or suggested by Horstmann. Since there is no spidering process performed, then as affected by the Amendment dated December 8, 2003 (first filed August 4, 2003), there can be no verification through the spidering step that second link information corresponding to the second link from the Webmaster's site to the Owner's site is present at the Webmaster's site.

Fourth, step (b) requires the first link information to be retrieved from the database maintained by an administrator. There is no teaching in Horstmann to use the first link information retrieved from a database to access the Webmaster's site. This exact argument was provided in the August 4, 2003 response and not addressed in the Final Office Action, although many arguments were addressed by the Final Office Action.

Fifth, in the Final Office Action, the Examiner states: "Applicant argues the prior art does not teach spidering the remote Website beginning at the link address." The Applicant did not argue the prior art did not teach spidering, the Applicant merely agreed with the Examiner that Horstmann did not teach spidering. In support of the Examiner's argument, Column 3 lines 14-26 and 27-43 are cited in addition to the citation above for Col. 6, lines 41-57 which have been shown above to provide no reference to an ability to spider.

Column 3, lines 14-43 are provided below and also provide no teaching or suggestion for an ability to spider:

Once the bike-shop owner fills out form 4, the bike-shop owner selects a “form complete” button 7, which initiates a transfer of the form data to the server supporting form 4 (hereinafter the “links server”). The links server includes software that presents and processes forms, and could be the same server that maintains the bookstore’s pages or some other server. Software on the links server (step 4) automatically modifies page A to include a link 6 (the fourth link information) from page A to page D as requested by the bike-shop owner. The new page A, including the link to page D, is redisplayed to the bike-shop owner. Thus, page A is modified and redisplayed without any intervention from the bookstore owner.

After a period of time (typically a few days), verification software, typically located on the links server, verifies (step 5) that the bike-shop owner reciprocated by providing a link back 5 to page C as requested on form 4. Because the bike-shop owner indicated on form 4 that the back link would be provided on page B, the verification software searches page B for link back 5 (the third link information) to page C. If link back 5 does not exist, then the verification software removes link 6 (fourth link information) from the bookstore’s page A to the bike shop’s page D. Alternatively, the software may issue a reminder to the bike shop (via e-mail, for example) to add link back 5 to the bookstore. Once link back 5 (third link information) is verified to exist on the bike shop’s page B, the method terminates. In this way, the inventive method provides for the creation of reciprocal page links.

Instead of “spidering”, the verification method taught by Horstmann teaches “the verification software searches page B for link back 5 (the third link information) to page C.”(Col. 3, lines 32-34). Page B was provided on the form 4 (Col. 3, lines 30-31). It is only this one web page, i.e., the one that the bike-shop owner provided on the form 4 that the Horstmann searches (page B only). Not a single page linked to page B is taught or suggested by Horstmann to be searched. Accordingly, there is no teaching or suggestion in Horstmann to “spider” as claimed in claim 1. In fact, a Horstmann sends an error message if the link is not found on page B. (Col. 6, lines 52-55).

The Examiner then states: “Applicant argues the prior art does not teach ‘accessing information of a form to conduct a spider step of verification’ in claim language.” This is a misquotation of applicant’s remarks. Applicant actually said: “There is no teaching or suggestion in the Horstmann as to how it could be modified to go from accessing information off a form to conduct a spider step of verification that is now required through amended claim 1.” The applicant maintains this is an accurate assessment as explained below in Part (B) which relates to the impropriety of formulating an obviousness rejection utilizing Horstmann and a “spidering” reference.

Dependent claims 2-4 stand or fall with independent claim 1. For any and all of the above reasons, Horstmann does not anticipate claims 1-4 of this application. Allowance of claims 1-4 is respectfully requested.

## **2. Anticipation Rejection of Claims 5-10.**

Claims 5-10 provide a method for establishing a link between a link page of an Account Owner and a site controlled by a Webmaster through the use of an Administrator. This method provides four steps which can be summarized:

- (a) soliciting first link information by the administrator from the Webmaster, said first link information comprising at least a URL address at the Webmaster’s site;
- (b) formulating a queue by the administrator containing at least some of the first link information;
- (c) presenting the queue to the account Owner for approval; and
- (d) creating a first link by the administrator on said account Owner’s link page upon approval of a said first link in said queue.

The Applicant was once again surprised to receive an anticipation rejection of claims 5-10 after receiving an obviousness type rejection in the First Office Action using one of the references used in the First Office Action as the basis of the anticipation rejection. Specifically, the Examiner acknowledged in May 2003: “Horstmann did not detail (c) presenting said queue to the account Owner for Approval.” However, in the Final Office Action, the Office Action cites column 5, lines 5-24 and column 9, lines 1-67 of Horstmann for such teaching.

Column 5, lines 5-24 provides:

Once the create-links-page form is filled out, the bike-shop owner selects, for example, a “form complete button” on the form to initiate a transfer of the form data to the links server. The links software on the links server then checks each specified link to determine whether they correspond with valid page addresses. If the links do not correspond with valid page addresses, an error message (step 53) is provided to the bookstore owner and the method returns to step 51, in which the form information is once again solicited. If the solicited links address existing pages, then the method moves to step 54, in which the links software assembles the new links pages (step 54) and presents the new links page to the bike-shop owner for approval (step 55). The bike-shop owner can then approve the page by, for example, selecting a “page approved” button (step 56), in which case the software will update the server to include the new page (step 57). Alternatively, in step 56 the bike-shop owner could elect not to approve the new links page, in which case the method would return to step 51 in which a form solicits link-page layout data.

This paragraph teaches a method for a Webmaster (bike shop owner) to create a link page for the Webmaster (bike shop owner). As broadly interpreted, the “software” could be the administrator that “solicits” first link information from the Webmaster, and even a “queue” could be formulated. Unfortunately, the Examiner misinterprets the remainder of this paragraph. It is the Webmaster (bike shop owner) which approves or disapproves the queue, not the Account Owner (bookstore owner, in Horstmann). These are two separate entities as explained in detail throughout the specification. In fact, the Account

Owner (Subscriber Website Owner) and Webmaster are defined as terms in the Glossary of Terms on page 1 of the specification as originally filed. The Examiner correctly identified in the First Office Action: “Horstmann did not detail (c) presenting said queue to the account Owner for approval.”

Column 9, lines 1-67 was also cited by the Examiner for support and provides an Appendix containing some of the software code apparently created by Mr. Horstmann. Lines 1-27 appear to relate to the setup, settings of the program, and startup. Lines 28-31 appear to relate to the creation of Web page A as described in the specification in Column 2, lines 40 and 61, respectively. Lines 32-39 appear to relate to Web page B as described in the specification Col. 3, line 3 and lines 52-54, and its creation.

Lines 41-45 appear to be the only lines of code which relate to “approved” and “pageAccepted”. Both of these references are believed to refer to approval and “pageAccepted” from the Webmaster (**not the Account Owner**) as described in the specification with reference to Col. 5, lines 5-24, as explained above. There is no teaching or suggestion in the Horstmann reference that the Account Owner can accept the creation of links. In fact, column 3, lines 24-26 teaches away from this capability: “page A is modified and displayed **without any intervention from the bookstore owner.**” (emphasis added)(The Bookstore owner is an Account Owner while the bike store owner is the Webmaster, in this example). Lines 46 – 51 and Lines 52-60 appear to editing of Link Pages A and B, respectively, while Lines 61-67 appear to relate to adding links to the link pages once the link pages are created.

Step (d) is also not performed by Horstmann. In support of the Examiner’s rejection, step 56, Fig 5, col 1 line 60-col2 line 4, 28-55, and col 2 line 63-col 3 line 42

are cited. Step 56 in Figure 5 is described in detail in Col. 5, lines 17-24 where it is the bike shop owner (Webmaster, not account owner) which is presented the links page for approval. It is important to remember that the bike shop owner is the Webmaster, not the Account Owner, in this example in Horstmann. Accordingly, no queue is presented to an Account Owner for approval in Horstmann and no first link is created upon approval of the queue.

Horstmann Col 1 line 60 – col 2 line 4 states:

A method establishes reciprocal page links between pages on the Internet. According to the method, individual sites (collections of pages) include dedicated links pages that contain lists, primarily to other sites. The links page associated with a given site (the first site) includes an “add link” button that, when selected, allows an owner of a second site to add a link to the links page of the first site. The new link can be used to establish a link from the links page to the second site. To ensure reciprocity, the method also includes prompting the owner of the second site for a link back to a page of the first site and later checking of the second site for the back link.

There is nothing in this passage which teaches or suggests creating a first link by the administrator on the Owner’s link page to provide access to the Webmaster’s site “**upon approval** of said first link in said queue,” by the account Owner as claimed.

Column 2, lines 28-54 articulate the relationship of “the first site 1 (for example, a site maintained by a bookstore)” which equates to an Account Owner, and a second site 2 (a site maintained by a bike shop) which equates to a Webmaster. The first site 1 has an “add link” link 3.

Col 2, line 60 – Col 3, line 42 articulate the process of adding a link from the Account Owner’s site 1 (bookstore) to the Webmaster’s site 2 (bike shop). The Webmaster performs the work and page A (on the Owner’s site 1) “**is modified and redisplayed without any intervention from the bookstore owner.**”(emphasis added)

(Col 3, lines 24-26). Since there is no intervention, there cannot be approval of a queue before creating the first link according to step (d) of claim 5.

In the Final Office Action to the amendment of August 2003, the Examiner correctly identified a misstatement in the Applicant's Amendment and Response of August 2003. Namely, the Applicant stated: "the account owner is never presented with the opportunity to reject links edited by the Webmaster to the account owner's site." What the applicant meant to say was "the Account owner is never presented with the opportunity to reject a link to be added to the Account Owner's Web site by the Webmaster". This more accurately presents the applicants position. In Horstmann, the Account owner can edit the links page (col 5, lines 37-39) including those added by the Webmaster. However the Account Owner only has the power to delete links after they have been added (i.e., the Account Owner lacks the ability to reject a queue to add a link to his/her links page as required by step (d) before creating the link).

Accordingly, the Examiner has made an improper anticipation rejection. Allowance of independent claim 5 and its dependent claims, namely 6-10 is respectfully requested. These claims are also not properly rejected using an obviousness rejection as explained below in part (C).

### **3. Anticipation rejection of claims 11-15.**

Claims 11-15 relate to a method of autorotation of links having the steps:

- (a) displaying a plurality of links in a first order in a non-editable view; then
- (b) utilizing a formula, creating a second order for said links, said second order being different than said first order; and then

(c) displaying the plurality of said links in the second order independent of changes made by a human operator associated with any of the plurality of links associated subsequent to the display of the plurality of links in the first order.

The applicant would agree with the Examiner that Figure 4, element **430** is a display of a plurality of links in a non-editable view. Accordingly element (a) is present in Horstmann. Unfortunately, this is all that Horstmann teaches as it relates to these claims.

Element (b) provides for the utilization of a formula to create a second order of links which differs from the first order. The Final Office Action states: “Horstmann creation or editing of links page wherein the non-edit page as a first order and edited page as second order, col 5 lines 35-53, the read only mode or non-editable /view only, col 5 lines 35-53”.

What the Applicant interprets this to mean is the non-edited page is a first order and the edited page is a second order citing col 5, lines 35-53. Nevertheless, this is not what column 5, lines 35-53 teaches as it relates to the claimed subject matter.

Column 5, lines 35-53 states:

Using the methods described above in connection with FIGS. 1-3, an Internet user who has access to a links page can add a link to that links page. However, only the “owner” of a links page has the power to otherwise edit the links page. For example, with respect to links page **400**, the bookstore owner can delete links, change the look of the page, or add one-way links that will not be deleted in the event that a link back is not established. Such one-way links may be desirable for example when a relatively small site wishes to provide a link to a large site that will not provide return links. In addition, the owner of a links page may select a “read only” mode for that links page, in which case the add-link button is either absent or prompts a message explaining that new links will not be added. In one embodiment, the read-only mode is selected by specifying, during the creation or editing of links page **400**, that the number of allowable addition links is zero. This read-only option enables an owner



of a links page to control the number and/or destination of links on the links page.

In order to provide the rejection, the Examiner equates a formula to a links page. A formula is not a links page as proposed by the Examiner, although a formula could certainly be displayed on a links page. The example provided by the Applicant in the specification as originally filed states:

...suppose first links **52,72** begin with the letter “A” and the first link **73** begins with the letter “B”. The formula could be to place all listings beginning with “B” before any listing with “A”, such as by taking the “A” listings and providing them at the end of the listing of links. (Page 9, lines 12-15).

The applicant believes the Final Office Action takes the liberty of performing the Applicant’s task of being the lexicographer and improperly interprets formula to fit the rejection. This is improper.

Column 5, lines 35-53 teach an ability for an account Owner to edit a links page **400**. It does not teach or suggest an ability to rotate links utilizing a formula. In fact the applicant amended claim 11 in response to the First Office Action to distinguish the editable views and displays taught in this passage of Horstmann. Specifically, step (c) of claim 11 requires “displaying the plurality of said links in the second order **independent of changes made by a human operator** associated with any of the plurality of links associated subsequent to the display of the plurality of links in the first order.”(emphasis added) This language explicitly addresses the inapplicability of the editable view/non-editable manual update of a links page by an account Owner described in Horstmann. The amendment and response of August 4, 2004 explained this step in detail and is provided again in the next twelve paragraphs.

Claim 11 was amended to require that the method begin by displaying a plurality of links in a first order in a non-editable view; then to utilize a formula creating a second order for sublinks, so that the second order being different than said first order; and then displaying the plurality of said links in the second order independent of changes made by a human operator associated with any of the plurality of links subsequent to display of the plurality of links in the first order. As stated in lines 20 and 21 of page 4, “a need exists to provide an improved method for establishing and/or categorizing links.” The ability to auto-rotate links is described in detail in the detailed description of the drawings provided on pages 9 and 10 the specifications as originally filed starting at line 8 on page 9 and ending on line 2 on page 10. Amendment to claim 11 clarifies the auto-rotation feature which is not discussed or suggested anywhere in the Horstmann reference.

Specifically, the first order of links are now required to be displayed in a non-editable view. This is very different than the HTML file layout of the links page shown in Figure 4 and described in column 4, line 43-column 5, line 4 cited by the Examiner in the Horstmann reference. This cited reference is made to an editable form provided to an account owner not a non-editable view as is now claimed.

The reasoning provided by the Office Action for step (b) of the method is that the first order is a non-edited page. This is an inaccurate interpretation of the Horstmann reference. The specific citation provided for reasoning for step (a) is the “form as displayed to the bike-shop owner” (column 4, line 53-54). It is this editable form in the Horstmann reference that allows “one or more links to other pages” (column 5, line 1). The amendment to claim 1 explicitly differentiates this type of editable page from the claimed limitation. Specifically, the first order is now required to be displayed in a non-editable view as amended by claim 11.

The amendment also requires Step (b) of the method to be after the display of the plurality of links in the first order. The reasoning provided by the Office Action as step (b) is confusing in that it relates to the “creation or editing of links page when the non-

edit page represents the first order and the edited page is the second order.” However, by requiring the second order to come after the first order, this reasoning can no longer relate to the claims since the Applicant explicitly requires the first order to occur before the second order in amended claim 11. Since column 5, line 35-53 relate to the “owner” of the links page having the ability to edit the links page, this reasoning has been circumvented by the amendment to claim 11 which operates differently than the logic utilized to formulate the rejection to claim 11 as originally filed.

Finally, the third step of the method (step (c)) now requires the plurality of the links to be displayed in the second order independent of the changes made by human operator associated with any of the plurality of links subsequent to the display of the plurality of links in the first order (i.e., this means that neither the owner nor the person attempting to establish the links page creates a second order solely by adding or deleting a link on an edit page). The citation provided for the reasoning to step (c) in the Office Action explicitly directs one to column 3, lines 14-26 and columns 6, lines 4-21 which should be looked at in some detail. Specifically, column 3, lines 14-26 describes the ability of the software on the links server to include a link from one page to another. While it certainly redisplay the link on a link page, there is no evidence in column 6, lines 14-21 that the order provided by the person completing the form (a first order) is not the exact same displayed order described in column 3, lines 14-26. Furthermore, in column 6, lines 4-21, the owner is the one which manually reformats the links page to provide the links in a second order. By requiring that the plurality of links be displayed in a second order **independent of changes made by the human operator** associated with any of the plurality of links, then this amendment defeats the logic utilized by the Office Action. Specifically, column 6, lines 4-10 requires the human operator to make changes to link order through the editing process on the edit page.

The applicant is attempting to claim auto rotation of links which does not require a human operator to perform the rotation of links on a link page. Although the initial

language was believed to be satisfactory, the interpretation of Horstmann provided by the Examiner suggested the initial claim language was too broad. By narrowing the claims as provided in response to the First Office Action, the initial reasoning provided by the Office Action no longer supports an anticipation rejection of the amended claim 11. Furthermore, since there is no discussion of auto-rotation of links in Horstmann, Horstmann by itself or with any of the other cited references suggest or teaches this auto-rotation feature. This feature is praised in an article written April 18, 2001, by Ralph Tejtmeier: “Especially nifty: The ‘auto link rotator’ which rotates your links nightly to ensure equal coverage for all of the links on your site.” Accordingly, claims 11-14 are believed to be allowable.

Additionally, new claim 15 is provided which requires the second order links to be provided in a non-editable page. This claim further differentiates this particular claim from the editable pages which were cited as providing links in one of the first or second order by the Office Action depending upon whether one referred to the reasoning or the citation provided in the Office Action. Editing of links could hardly be interpreted as an auto-rotation feature attempted to be claimed by the applicant. This is certainly not to say that editing of any of the plurality of links cannot take place or even the addition or subtraction of links while auto rotation takes place. However, the method as claimed provides for the auto-rotation of links independent of whether or not an operator edits the information associated with any of the plurality of links or not.

Claim 12 was specifically rejected by the Office Action under the rationale that Horstmann “discloses the formula in an alphabetical construction as an inherent feature of link list URL” citing column 11, lines 44-45 or database citing column 9, lines 40-45. The applicant respectfully disagrees with the reasoning provided by the Office Action.

The specification discusses a form being provided to a person who desires to provide a link to his website from another’s. The multiple links allowed by this form are never discussed as being alphabetized by any entity. It is believed to be only with

hindsight reconstruction that alphabetizing can be read into the specific citation of the Horstmann reference. Nevertheless, as affected by the amendment in claim 11, the form does not meet any of the claimed limitations of claim 11 since the first order of links is one displayed in a non-editable view.

Claim 13 was specifically rejected by the Office Action with a citation to column 5, lines 35-53. In claim 13, a specific limitation is required as it relates to creating a second order of links. Specifically, it further comprises assigning a particular letter or number, performing a mathematical operation, using said formula to the number assigned to the mathematical formula, and generating the second order. Horstmann, Column 5, lines 35-53 discuss how an owner of a links page has the ability to edit links. It makes no reference to automatic reordering of links, furthermore, it makes no reference to the ability to assign a number to an alphabetical letter. The reasoning provided by the Office Action states that “creation or editing of links page from the non-edit page as first order and edited page as second order.” As amended claim 11 requires a particular ordering of steps wherein the first order is provided before the second order. Horstmann teaches an edit page provided before a non-editable page. Accordingly, the ordering of the pages in Horstmann does not meet the limitations of the amended claim. Furthermore, Horstmann does not suggest the specific ordering provided by amended claim 11. Finally, regardless of how the pages are ordered, it is difficult to understand how the mathematical operation of assigning a number to a letter as performed through the citation to column 5, lines 35-53.

Finally, claim 14 is rejected by a similar citation to Horstmann, column 5, lines 35-52. By removing the ability for a first order to be an editable page, and then performing the auto-rotation of links to display a second order, the rationale utilized for this rejection is no longer applicable.

In response to Applicants arguments and amendment, for claim 11, the Examiner states: “Examiner points out the prior art taught the read only mode for the links page.”

While it is accurate that a read-only mode is taught for displaying a links page in Horstmann, there is no teaching to provide a formula which was then applied to the order of links and then to redisplay the links in a second order, with the second order different from the first as claimed.

The Examiner continues in the Final Office Action: “Examiner points out the prior art taught (a) the links page may be selected as a read-only mode or a non-editable view [Horstmann, col5, lines 35-53]; then creating a second links page or a dedicated link page similar (or associated subsequent to the first links page [Horstmann col 4, lines 33-46].

Horstmann, col. 4, lines 33-46 states:

Links page **400** includes a graphic field **410**, a title field **420**, a links field **430**, an add-link button **440**, and an edit button **445**. Graphic field **410**, title field **420**, and links field **430** are conventional page elements in HTML documents. The function of the add-link button **440** is described above in connection with add-link button **3** of FIG.1, and edit button **445** is discussed below in connection with FIG. 5. In addition to the foregoing elements, links page **400** includes a create-links-page button **450**, which allows users to create their own dedicated links page similar to links page **400**.

FIG. 5 is a flow diagram illustrating a method used to create a links page similar to links page **400**. For illustrative purposes, bookstore site **1** and bike-shop site **2** are used to describe the method of creating a links page.

There is nothing in this passage that suggests the creation of a second order of links which differs from a first order **independent** of changes made by a human operator as claimed in step (c). The Examiner has apparently overlooked the fact that editing a page by an operator is performing a change by a human operator. Accordingly, the rationale of the Final Office Action is incorrect.

Finally, the Examiner correctly observes that “(c) the second order is an editable page changed by a human operator” in Horstmann. As affected by the August amendment, the second order has to be different from the first order **independent** of

changes made by a human operator. If the page is changed by the human operator, the new page is not a new order created with a formula independent of changes made by a human operator as claimed. Accordingly this is an improper rejection.

Claims 11-15 are allowable over the Horstmann reference as there are elements in the claims not taught or suggested by Horstmann. Allowance of these claims is respectfully requested.

### **Claim 12**

In rejecting claim 12, the Final Office Action states: “Horstmann discloses the formula in an alphabetical construction as an inherent feature of link list URL [Horstmann col 11 lines 44-45] or database [Horstmann col 9 lines 40-45].”

Col 11 lines 44-45 states: “20. The method of claim 19, wherein the links field comprises a list of URL’s.” This does not teach or suggest the use of a formula having an alphabetical construction to re-order links from a first order to a second order independent of human operator changes as claimed.

Col 9 lines 40-45 states:

```
Case CreateC:
    //      create new cli page – (c) approved,
           update database
    is (pageAccepted())
           create Entity();
    else
           outputCreateForm();
    break;
```

This citation also does not teach or suggest reordering a links page with a formula having an alphabetical construction independent of human operator changes as claimed.

Accordingly, claim 12 is separately allowable on this basis.

### **Claim 13**

Claim 13 provides for the additional limitation: “wherein the step of creating the second order of links further comprises assigning a particular letter a number, performing a mathematical operation using said formula to the number assigned to the alphabetical order, and generating the second order.” The Final Office Action cites col 5, lines 35-53 for the new elements added by this claim. This citation is provided above on page 15 of this brief. Nowhere in that passage is there any mention or suggestion to provide this step. Claim 13 is separately allowable on this basis.

### **Claim 14**

Claim 14 provides for the additional limitation: “wherein the step of creating a second order comprises providing an alphabetical letter at a beginning of the second order different than a letter begging the first order. The Final Office Action cites col 5, lines 35-53 for the new elements added by this claim. This citation is provided above on page 15 of this brief. Nowhere in that passage is there any mention or suggestion to provide this step. Claim 14 is separately allowable on this basis.

### **B. First Office Action Obviousness Rejection of Claims 1-4**

In the First Office Action, dated May 22, 2003, the Examiner correctly identified that: “Horstmann does not teach (c) spidering through the Webmaster’s site beginning at the link address.” The Examiner also observed that Kredo describes the use of a Webspider to find a term amongst linked web pages. Nevertheless, there is no teaching or suggestion to combine these references to reject claims 1-4 with a prima facie case of obviousness. Furthermore, not all of the elements of claims 1-4 are taught by the proposed combination.



Horstmann teaches the accessing of the server that includes the links pages to be checked (Col 6, lines 45-47). The software then fetches the first link of the first page to be checked, and then exercises the link. "If the page does not exist, the method moves to step 74, in which the links software sends an e-mail message to the owner of the entity to which the link was directed." (Col 6, lines 52-55). The e-mail identifies the defective link.... (Col. 6, lines 55-56). If a page is found to exist, the links software verifies the existence of a back link associated with the link being inspected (step 76). (Col. 6, lines 58-60).

The software taught by the Horstmann reference accesses pages and exercises links. It does not spider from pages accessed. It makes no teaching or suggestion to spider to other pages. In fact, col 6, lines 52-55 teach against such a practice since when the identified page does not exist, an error message is sent and the link is deleted in step 75. (Col 6, line 57).

The applicant's method need not rely solely on the accuracy of the data solicited from the webmaster and allows for the link location to be moved about the website without continually alerting the involved parties. By spidering the webmaster's site, the second link information may be found on the site of the webmaster regardless of where it is located. In Section 2143.01 of MPEP, the Patent Office has provided evidence that "the fact the claimed invention were well within the ordinary skill of the art is not sufficient by itself to establish teaching of obviousness.":

A statement that modifications of the prior art to meet the claimed invention would have been " 'well within the ordinary skill of the art at the time the claimed invention was made' " because the references relied upon teach that all aspects of the claimed invention were individually known in the art is not sufficient to establish a *prima facie* case of obviousness without some objective reason to

combine the teachings of the references. *Ex parte Levensgood*, 28 USPQ2d 1300 (Bd. Pat. App. & Inter. 1993)  
> See also *Al-Site Corp. v. VSI Int'l Inc.*, 174 F.3d 1308, 50 USPQ2d 1161 (Fed. Cir. 1999) (The level of skill in the art cannot be relied upon to provide the suggestion to combine references.).<

There is no teaching or suggestion in the Horstmann as to how it could be modified to go from accessing information off a form to conducting a spider step of verification that is now required through amended claim 1. Accordingly, as amended, claim 1 is now believed to be allowable over the rationale provided for the initial obviousness rejection of claim 1. Furthermore, pages of testimonials praising the reciprocal link checker feature are provided in Appendix B.

While it appears that the Horstmann reference maintains a database, there is no teaching in Horstmann that the database is utilized to **retrieve** first link information as suggested by the Office Action with a citation to column 9, lines 40-45 or column 10, lines 1-10. While it is true that the Horstmann reference provides for “verifying that page (b) includes the third link information,” this is apparently done directly from the soliciting of information from a second entity as taught in column 10, lines 48-51. Claim 1 has been amended to require that the first link information be retrieved from the database before determining whether the first link information corresponds to the existing resource at the webmaster’s site.

Accordingly, claims 1-4 are not rendered obvious by the combination of Horstmann with a webspider routine, such as the one taught in Kredo. Allowance of claims 1-4 is respectfully requested.

### **C. First Office Action Obviousness Rejection of Claims 5-10**

The First Office Action rejected claims 5-10 as being obvious over Horstmann in view of Mellquist, U.S. Patent No. 6,115,545. The Office Action correctly states that “Horstmann did not detail (c) presenting said queue to the account Owner for approval.”

This is because this step is not performed in Horstmann. See column 3, lines 24-26 where it says “page 17 is modified and displayed **without any intervention from the bookstore owner.**”

The downfalls of the Horstmann procedure are spelled out in detail in the specification as originally filed on page 3, lines 8-page 4, line 2. Namely, the account owner is never presented with the opportunity to reject links edited by webmaster's to the account owner's site (i.e., it is an automatic link addition). Although Mellquist shows an accept or deny form in Figure 4 utilized in conjunction with a configuration content page, it provides no teaching or suggestion relating to an ability to deny a link to be provided from one party to another on a link page.

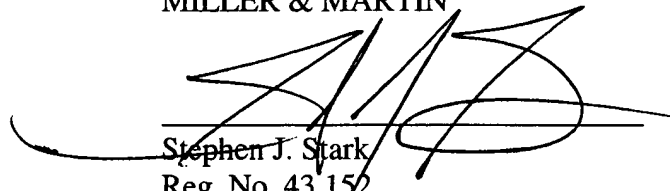
The obvious rejections provided by the Office Action does not meet the standard of *prima facie* case of obviousness. In fact, the proposed modification would render the Horstmann reference unsatisfactory for its intended purpose under MPEP § 2143.02. Specifically, the automatic feature of Horstmann would be disabled under the Office Action's rationale. Furthermore, the acceptance of the Applicant's service over the prior art speaks volumes. Please see the attached articles and testimonials provided as Appendix C. Accordingly, the Office Action's rejection is improper and should be withdrawn. Claims 6-10 stand or fall with claim 5.

### III. CONCLUSION

Claims 1-15 are not anticipated by Horstmann. Claims 1-11 are also not rendered obvious through a combination of Horstmann with another reference. Allowance of claims 1-15 is respectfully requested.

Respectfully submitted,

MILLER & MARTIN

A large, stylized handwritten signature in black ink, appearing to read 'S. Stark', is written over a horizontal line.

Stephen J. Stark

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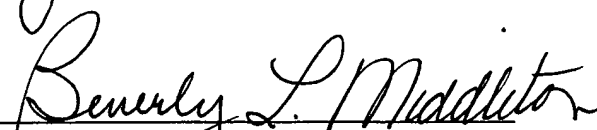
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On this 29<sup>th</sup> day of June, 2004.

  
\_\_\_\_\_  
Beverly L. Middleton

## APPENDIX A

1. (Amended 8/4/04) A method of verifying reciprocal linking of a first link between an account Owner's link page and a Webmaster's site and a second link from the Webmaster's site to the account Owner's site using a database including first link information having a link address for a location at the Webmaster's site, the database maintained by an administrator, the method comprising:
  - (a) retrieving first link information from the database; then
  - (b) determining whether the first link information corresponds to an existing resource  
at the Webmaster's site by accessing the Webmaster's site using the first link information retrieved from the database; then
  - (c) spidering through the Webmaster's site beginning at the link address; and
  - (d) verifying through the spidering step that a second link information is present at  
the Webmaster's site with said second link information corresponding to  
the  
second link from the Webmaster's site to the Owner's site.
2. (Amended 8/4/04) The method of claim 1 further comprising the step of the administrator providing a message to the [first] Webmaster if the second link is not present at the Webmaster's site.
3. (Original) The method claim 1 further comprising controlling the link pages at the account Owner's site by said administrator.

4. (Original) The method of claim 1 further comprising hosting the administrator on a separate server than the account Owner.
5. (Amended 8/4/04) A method of establishing a link between a link page of an account Owner and a site controlled by a Webmaster using an administrator, the method comprising:
  - (a) soliciting first link information by said administrator from said Webmaster, said first link information comprising at least an address for a [location] URL address at the Webmaster's site;
  - (b) formulating a queue by said administrator containing at least some of said first link information;
  - (c) presenting said queue to the account Owner for approval;
  - (d) creating a first link by said administrator on said account Owner's link page to provide access to said Webmaster's site upon approval of a said first link in said queue.
6. (Original) The method of claim 5 further comprising receiving an e-mail address for the Webmaster.
7. (Original) The method of claim 5 further comprising receive a category from the Webmaster and said administrator utilizing said category to locate said first link on said account Owner's link page.
8. (Original) The method of claim 5 further comprising providing the account Owner the opportunity to store at least some of said first link information in said queue.

9. (Original) The method of claim 5 further comprising providing the address for the Webmaster's site as a URL address.
10. (Original) The method of claim 5 further comprising representing the queue as html.
11. (Amended 8/4/04) A method of hosting links at a link page comprising:
- (a) displaying a plurality of links in a first order in a non-editable view; then
  - (b) utilizing a formula, creating a second order for said links, said second order  
being different than said first order; and then
  - (c) displaying the plurality of said links in [a] the second order independent of changes made by a human operator associated with any of the plurality of links associated subsequent to the display of the plurality of links in the first order.
12. (Original) The method of claim 11 further comprising providing the formula in an alphabetical construction.
13. (Original) The method of claim 12 wherein the step of creating the second order of links further comprises assigning a particular letter a number, performing a mathematical operation using said formula to the number assigned to the alphabetical letter, and generating the second order.
14. (Original) The method of claim 12 wherein the step of creating a second order of links further comprises providing an alphabetical letter at a beginning of the second order different than a letter beginning the first order.



15. (New Claim added 8/4/04) The method of claim 11 wherein the second order of displaying the plurality of said links is in a non-editable view.

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### Review: LinksManager Reciprocal Links Service

By Ralph Tegtmeier

April 18th 2001

Reader Rating: 6.7

#### Ralph Tegtmeier

Ralph is the co-founder and principal of



**Reciprocal linking can be a prime traffic generator. It's also very simple - or is it?**

Sounds like a great idea: You put my link on your web site, and I'll put your link on mine. But anyone who has ever actually done it knows how time-consuming it can be to add, edit and monitor all those precious, traffic pushing links. Since people tend to be forgetful, reminding reciprocal partners of their self declared intentions by actually setting up that link to your site can turn into a real nightmare in its own right. Moreover, links may break sooner or later and it's truly no fun having to check hundreds if not thousands of them regularly.

Ok, so there's quite a lot of software (both free and commercial) around tackling submission, registration and administration of reciprocal links. But this, too, comes at a price: Installation and configuration, test runs and updates will blithely eat away at your resources and time. And not everyone's comfortable with implementing web server programs.

Enter **LinksManager**: a centralized ASP based solution with a full set of customization features leaving little to be desired. No software to download or install, no coding, no FTP, no upgrades or software patches.

The list of features is impressive: The integrated reciprocal link checker searches the net to verify that your link or banner exists on all websites listed on your links pages. The dead link checker identifies and flags dead links listed on your links pages.

fantomaster.com Ltd. (UK) and fantomaster.com GmbH (Belgium)

[fantomaster.com](#), a company specializing in Webmaster software development, industrial-strength cloaking and search engine positioning services.

Ralph Tegtmeier has written **4** articles for SitePoint with an average reader rating of **7.3**.

[View all articles by Ralph Tegtmeier...](#)

Especially nifty: the 'auto link rotator' which rotates your links nightly to ensure equal coverage for all of the links on your site.

What's more, you don't have to wave goodbye to any existing links pages you may have generated already. They can easily be imported and integrated into your new LinksManager setup without any retyping or recoding. That feature in itself can save you dozens of hours.

A "Cosmetic Control" panel allows you to seamlessly blend your links pages' design and layout with the rest of your website, even though these pages will be hosted on LinkManager's server. As people venture from your site to your links pages, the only thing hinting at the fact that the directory isn't on your server will be the URL in the browsers "address" bar. The "Featured Link" category allows for special visual positioning to highlight the links of your choice. You could, for instance, use this feature to send extra traffic to partners who send you alot of visitors.

Will using LinksManager boost your link popularity with the search engines? Yes. Even though your directory will be hosted remotely, reciprocal links will point to your core domain name. Of course it's still up to you to request reciprocal links. But, assuming that your directory sends a decent amount of traffic to sites it links to, the task will be much easier than you think. [Gamblinglinks.com](http://Gamblinglinks.com), which uses LinksManager, has nearly 28,000 links pointing to its domain name!

Webmasters can easily add and edit their own links on your site and await your approval - no coding or FTP software required here. Newly added links are highlighted automatically with the graphic of your choice in the control panel, making approval or denial as simple as clicking your mouse.

Since LinksManager is remotely hosted, you may be wondering about the reliability issues involved. After all, if LinksManager is down, so is your links page. Well, I'm happy to report that you can except virtually no downtime with LinksManager. I used a third-party site monitoring service to check up on LinksManager every few minutes, and I found the site's speed and reliability to be in-line with other major sites. In other words, your own site is more likely to be down than your LinksManager hosted link pages.

Basic pricing starts at \$19.95 per month which gives you a maximum of 20 categories to structure your links under. Compare that to \$749 for [Hyperseek](http://Hyperseek.com), a "directory management" script that you'll spend hours setting up and customizing. You can easily see just what a great value LinksManager really is. Additionally, you can earn a free month of service for each user that you refer to the service.

Result: Highly recommended.

Check it out here: [www.LinksManager.com](http://www.LinksManager.com)

» Page 1

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As seen at [ABCnews.com](http://ABCnews.com),  
[SmartComputing.com](http://SmartComputing.com) and [Entrepreneur.com](http://Entrepreneur.com)

## "I Coulda been a Contenda"

By Jim Daniels

Is your site a "contender"? Or do you have a "limited presence" online?

Maybe you're a "900 lb. gorilla?"

What's with all the jargon?

Glad you asked.

A slick new "Visibility Index" opened recently on the web and you should try it today. It measures your website's visibility online by counting up all the links to your site. But rather than simply telling you how many links you have across the world wide web, this one rates you from "limited presence," to "contender", "player" and even "900 lb. gorilla."

The site also lets you enter up to four other URLs so you can compare yours to them. What's more, the results show your URL among lots of popular sites on the web.

Not only is this free tool fun to try, it can reveal important information about your web presence.

Give it a go at: <http://www.marketleap.com/publinkpop/>

I just ran this bizweb2000.com site through and it was interesting to see it wedged between [www.Macys.com](http://www.Macys.com) and [www.Southwest.com](http://www.Southwest.com), but just shy of [www.MarthaStewart.com](http://www.MarthaStewart.com) and [www.GeorgeWBush.com](http://www.GeorgeWBush.com). (See, I told you it was fun!)

But all fun aside, whether you find your site in the limited presence category, or even "Contender" or "Player", you should always be working toward one goal - getting more links.

Not only do lots of links bring the obvious - lots of traffic, they also help you in another important race - search engine ranking. It is well known that major search engines have been relying more and more on link popularity as a deciding factor in where they rank sites in their results pages.

### Could you become a gorilla?

OK, so how many links can you really get? Well, let's be honest. A lot has to do with your overall business budget and specifically, your marketing budget. If you think you can get to 900 lb. gorilla - that's half a million links - you may be kidding yourself.

Take a look at the sites in that column. Every last one is a giant

**ezBizWebHosting**  
Simple, affordable web hosting



"Jim, we can't find anything like your marketing books anywhere!" -  
Jim and Dena Sellers, Illinois



company with huge marketing dollars, including presence on television, radio, and the like.

So how about the next category down, "player" - with 100,000 links or more? Is it doable with a small or home business budget?

Why not! If a cheapskate like me can get 25 percent of the way there, anybody can. Sure, it would be quite an accomplishment on a limited budget, but it's possible over time. You just have to have a plan! And I'd like to help you with that right now...

### Get a powerful plan in place

So how does a site start moving up the list?

Simple. Get links. Or better yet, have a powerful plan to continually get links.

Getting other sites to link to yours takes a bit of originality. You can't just slap up a "link to us" page and hope the job gets done. And you can't just email webmasters with "wanna swap links" messages. (Well, you can do those two things, but don't expect too many quality links!)

Perhaps the best strategies for growing link popularity are yet to be discovered. Think original and you can be an expert in this new arena!

That said, below are a two ways that I now get **lots** of links. While I don't claim to have invented these ideas, I **did** put my own twist on them and I invite you to emulate these strategies at your site...

#### 1. Pre-license all your best stuff.

If you ever create your own tips, articles or content for the web or email newsletters, consider pre-licensing it to others. If you're a web designer, you can do the same thing with your images, icons and the like. And then make the pre-licensing viral!

If it's content you write, pre-licensing it for others is as simple as including a short footer after your work. It looks something like this:

\* You have permission to reprint what you just read. Use it in your ezine, at your website or in your newsletter. The only requirement is including the following footer with it...

*Article by YOUR NAME, visit [www.YourWebsiteUrl.com](http://www.YourWebsiteUrl.com) for more original content like this. Reprint permission granted with this footer included.*

If you're a designer you would simply put a statement like that in your terms of use page, like this...

\* These images can be used freely. Please include the

Have you read the book yet?



Stop By Our Software Shop...



And get your free web promotion software!

following at your site...

*Images at this site, courtesy of [www.YourWebsiteUrl.com](http://www.YourWebsiteUrl.com) You may use them at your site by simply including **THIS** same statement at your site.*

Getting the idea? See how this works to get you links?

Even if one site uses your content, you could obtain an endless number of links without the linking sites even coming to your site!

There are lots of websites in need of decent content. Supply it and you can benefit greatly - if you do it right!

## 2. Bribe webmasters into linking up.

The next strategy that can work very well is the "bribe". In a nutshell, you simply give something of value away to anyone who links to your site.

When done correctly, this strategy can be extremely powerful. All you need to get started is a few banners or buttons that people can use to link to your site, and a way to automate all aspects of the "bribe".

Here's a link to my own NEW implementation of this strategy. (You may want to read the rest of this lesson before clicking in.)

What you'll find at that URL is a new area of my site called the **Internet Marketer's Resource Directory**. But it's more than a niche directory. It is actually a link generation tool that bribes my visitors into linking to [bizweb2000.com](http://bizweb2000.com) by offering two distinct rewards:

- a. Marketers can secure a link from my site to **THEIR** best Internet Marketing Resources in what will be my new high-traffic directory.
- b. When they reciprocate with a link to my site, they get a free book just for participating.

**Is it working? You bet!**

The very first day it generated more than 40 new links to my site. (Let's see, 40 times 365 = 14,600 links a year. I may be able to get to 900 lb. gorilla after all.)

And here's the key to the early success of my new link-generating system... it's a new tool that automates the entire process called LinksManager.

LinksManager not only enabled me to create the directory in a few hours, it automates the entire "get links" strategy. In a nutshell, LinksManager is a Link Swap Automation tool, but as you can clearly see from my example, it can be much more. My

### What are *you* promoting online?

Our no-hype step by step guide *guarantees* your success...



new niche "directory" proves that.

Here's how LinksManager works: Through a web interface you create your "links page". When your website visitors start submitting their URLs, the system take over. It sends automated emails to all new submissions, checks their site for reciprocal links, sends email reminders if they don't reciprocate, and even gives away my book when reciprocal links are verified!

I'm quite impressed by the simplicity and the automation power this tool offers. Actually, I've seen nothing like it to date. And no, I'm not an affiliate. ;-)

OK, give it a look-see at: <http://linksmanager.com/bizweb2000/>

You'll find a rapidly growing "self-propelled" directory. Feel free to fill it with your best Internet Marketing resources. You're sure to get lots of visitors from the directory as other BizWeb eGazette subscribers do the same! (I'll also be linking to the directory from other busy areas of my site soon.)

While you're poking around, watch how the LinksManager system automates the entire process of getting new links. Pretty slick eh? If you like it, grab your own free demo of LinksManager by clicking the green "powered by" box at the bottom of each webpage.

Well, that about wraps up this lesson! If you take one thing from it, remember, a good "get links" strategy is a key to growing your business online. Use your imagination and develop a unique strategy of your own. I'll bet you can come up with something great if think creatively! Who knows, maybe someday your site will even be a "Contender" or better yet, a 900 lb. gorilla!

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\* Tips by Jim Daniels - Read Jim's free web-based guide at [Make-A-Living-Online.com](http://Make-A-Living-Online.com), it reveals how he makes six figures a year online in his part time, and how you can do the same.



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FOR IMMEDIATE RELEASE

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<http://linksmanager.com>



## New ASP Redefines Internet Reciprocal Linking Strategies



January 23, 2001 (INB) --  
[LinksManager.com](http://linksmanager.com)  
<http://linksmanager.com>, a new  
Application Service Provider, allows  
webmasters to harness the power of reciprocal linking to get the most out of  
their links pages. Every element - including adding new links, editing existing  
links, finding dead links and confirming reciprocal links - has been automated  
to save webmasters time.

In development for more than three years and with a patent pending,  
[LinksManager.com](http://linksmanager.com) is a unique service that gives users the tools to easily  
manage all facets of a full reciprocal linking campaign. No software  
downloads or installations are required, and a new account setup can be  
performed in less than 30 minutes. Webmasters can import their current links  
pages into their LinksManager account, or they can start new pages from  
scratch. A point-and-click cosmetics engine lets webmasters visually match  
their links pages with the rest of their website or create a bold new look from  
scratch. Most importantly, LinksManager eliminates the need for arduous,  
time-intensive HTML coding and can be run from any web browser with an  
Internet connection.

Two specific features of [LinksManager](http://linksmanager.com) shine above all others. The Reciprocal  
Link Checker automatically looks for links on the linking webmasters' sites.  
A daily report shows who is reciprocating and who is not. With one mouse  
click, a LinksManager account owner can remind all webmasters who are not  
linking back to the site to reciprocate. Another standout feature is the  
LinksManager Dead Link Checker. This feature scans a site's links pages,



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flags dead links for review, and removes them from the website until they become available. Websites powered by LinksManager will never contain links to long-closed or inactive websites.

After years of time-consuming efforts to maintain his own links pages, the idea for LinksManager was borne "...out of necessity", says Joel Lesser, CEO of Creative NetVentures, Inc., developers of LinksManager. "We've always known that reciprocal link campaigns are an excellent way to generate site traffic. But before LinksManager, maintaining a quality links page was very labor-intensive, requiring a tremendous amount of attention and effort. Unfortunately, most webmasters fail to achieve the benefits of a good reciprocal link campaign because they're just too busy to take care of all the necessary details. That's where LinksManager comes in."

The new service was designed with two main goals in mind: first, to simplify webmasters' daily operations by automating time-consuming or routine tasks. And second, to add value to their website by making their links pages interactive with state-of-the-art functionality.

Account owners will never be far from professional assistance. Developed by webmasters for webmasters, LinksManager.com offers an online support forum staffed by LinksManager gurus 24 hours a day, seven days a week. Users can even earn their service for free by referring other webmasters to LinksManager.com.

Lesser says, "Both expert and novice webmasters are very excited about the doors this service opens. The question is, what are all these webmasters going to do with all their free time?"

LinksManager.com is a registered trademark of Creative NetVentures, Inc.

For more information about LinksManager, visit <http://linksmanager.com> or contact Joel Lesser at [joel@cnvi.com](mailto:joel@cnvi.com).

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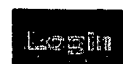
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**LinksManager Myths  
Refuted!** NEW



## What People Are Saying About LinksManager

LinksManager.com is enjoying a warm reception in the online press and from our own users. The links below show a few of the great things being said about LinksManager.com. If you have comments about your use of LinksManager.com, please feel free to [contact us](#) and we might post them here along with a link to your website's links pages!

### User Comments

"I have to tell you, I'm loving it so far. I've begun to set up a Directory of Internet Marketing Resources so I can show your service off at my site. Everything has been working flawlessly. The interface is fast and friendly. Your link system is truly the best I've seen to date, and I've seen a lot. You can feel free to use that as a testimonial if you wish." - **Jim Daniels, [BizWeb2000.com](#)**

"I just wanted to say that this is the most impressive service I have ever come across. The degree of thought that has gone into the needs of webmasters is beyond belief. The price for your service is even more beyond belief. I've only been with your service for a couple of days, but I can tell you now that I won't need the free 30 days to make up my mind. You have blown me away. Which is not easy. Just had to get that off my chest. Now back to the much easier task of adding links to my site. I spent many months building links on my site and it looked very un-organized. I organized in 2 days what took me months to make a mess of. It's actually fun now. Thank you." - **Jay Villaverde, [AllNaturalAlternatives.com](#)**

"First, I want to say - that your program is awesome! I have done link swapping the "Hard" way with minimal success. Your program has actually made link swapping fun. I love the manager interface and the depth of functionality that it offers." - **Tom Spaulding, [ShowerPik.com](#)**

"First of all let me say...support has been fantastic. I've had two problems, and you guys responded within hours...even at times you should have been asleep! Much appreciated." - **Ken Saltzman, [And Cut! Productions](#)**

"I just wanted to tell you that LinksManager is simply the best. You save tons of my workload on exchanging links with others. The interface is fast and friendly. Your system is excellent and I highly recommend everybody to use LinksManager for exchanging links with other sites." - **Henry Gold, [FreebiesGroup.com](#)**

"Your tech. help dept. has been great. The whole program has been great. About a month later and I have 48 links. I used Arellis over and over and sent out hundreds of e mails with not one response. You've got me hooked!" - **Kirk Atnip, [Aim Technical Training](#)**

"After spending a lot of time laboriously trying to exchange links with other sites with

only limited results, we decided to try LinksManager. What a difference! We now spend only minutes doing what took weeks before. Your software is excellent and so is your support. We heartily recommend LinksManager." - **Bill Graham, Jiff-e-Books.com**

"Thank you for the great service. Your service is superb and we have put off joining for too long. Very impressive and easy to use." - **Scot Spalding, LuxuryHomesandProperties.com**

"I must say that so far I am quite impressed with LinksManager.com, the system performs in minutes what used to take me hours and hours to do. What is best is the automatic linking checker and the automatic manager emailing system. In just a few days I have added about 100 quality link partners. In my old system it took me months of work to get that many. Very glad I found you guys." - **Randall Wilson, Artistic Silver Jewelry**

"You've got a great service and I think it will be successful, as managing links is a tremendous pain in the behind. ..the system is really nice and I think you have a great product." - **Craig Cassata, AskMrFlowerBucks.com**

"We have been using links manager for just over 2 months and all we can say about this service is that links manager is a dream come true for webmasters, it takes all the hassles away from reciprocal linking. Also, thanks for a brilliant service, I was currently with linkbank and it was absolutely appalling for a paid service. The major problem i have found in the past when adding links manually to my own site is that there is nothing at all stopping someone exchanging links and then the second after you add their link they take yours down, their link could be on your site getting your well earned traffic for weeks and you would not even know about it. This cannot happen when using LinksManager." - **Neil Bennett, FreeAdvertising.ws**

***"I was already impressed with LinksManager - now I'm bowled over. I will certainly recommend the service to other webmasters."***

***- Rob Palmer,  
FreelanceWorkExchange.com***

"Thanks for offering this service - it looks like the answer to one of my prayers!" - **Donna Schwarz Mills, ParentPreneurClub.com**

"I was really impressed with the ability to customize the pages to fit into my current website design. I was prepared to spend a day integrating into my design, but was totally surprised that it required only a few minutes. People are always sending me requests to add their resource to my pages, and before LinksManager there was no real easy way to do that. Now I can have them do the work themselves, AND they will also be adding a link to my site. That is the kind of WIN-WIN strategy I am always looking for." - **Robert Smith, SmithFam.com**

"Not all of us have the time or patience to research thousands of sites, send mass e-mails, and then upload each individual link into our web site. I've recently come across a tool called LinksManager that I'm very happy with." - **Lisa Melvin, WebAdvantage.net**

"I work with a lot of companies over the web, and I have to say without exception LinksManager is by far the most helpful, the most responsive and the most professional I have come across! I am very impressed." - **President, GPNet Publishing, Adult website, so links page URL not shown**

"One look at what LinksManager offered, and we knew it was what we needed to complete FunGranny.com. We had a co-branded search engine with Mamma.com but we lacked a directory. LinksManager provided us with an easy-to-use and very affordable solution. We especially like the email auto-responders, and our customers appreciate the immediate reinforcement after they add their links. Our Top Sites directory listings are a "plus" factor as well, and LinksManager's rotation of listings makes our site outstanding." - **Judy Wilson, [FunGranny.com](http://FunGranny.com)**

"Believe it or not, but only after 2 days my traffic has already picked up to approx 40 per day, and so far I've only got a few reciprocating. This is a powerful thing, especially when I start using it solely for reciprocating! Put it this way, I have doorway pages built by a "pro", even got several top 10 positions, they only give me a handful of visitors per day, I really think once I get this program going it will be a Lot Better than search engine traffic! I almost bought Zeus, I'm glad I didn't! This is so much easier, and no glitches like zeus apparently has. You have developed a great product and already love it, and I'm hard to please! I will be with you guys for a long time!!" - **Tony Rigby, [ASR Total Web Services](http://ASRTotalWebServices.com)**

"By the way, I \*love\* LinksManager. What an amazingly easy way to manage my links. I hated doing them before, and in fact I really didn't do much with links, because it was such a horrendous chore." - **Sarah Leon, [StrangePegs.com](http://StrangePegs.com)**

"I just have to say that this is an excellent service you provide. I was shocked to read your email as you normally dont get personal emails from dot-com's unless it something bad!" - **Craig Lancaster, [CellularUnderground.com](http://CellularUnderground.com)**

"I was already impressed with LinksManager - now I'm bowled over. I will certainly recommend the service to other webmasters. At Freelanceworkexchange.com, we have always appreciated the value of reciprocal links. Yet the need to spend time dealing with new links, editing links pages, uploading updates and checking for return links was always a big issue. LinksManager has changed all that. Now our links program runs on autopilot, generating traffic while we get on with generating business." - **Rob Palmer, [FreelanceWorkExchange.com](http://FreelanceWorkExchange.com)**

"We tried the 30 day free trial and loved it. LinksManager has saved us a great amount of time. It is easy to use and your support staff is great. LinksManager is worth the small amount to pay. I am the web designer and it is time consuming enough just keeping up with the new pages and the search engine game. I am thrilled to hand this job of links to someone else." - **Margaret Moore, [EquestrianDreams.com](http://EquestrianDreams.com)**

***"I just wanted to say that this is the most impressive service I have ever come across. The degree of thought that has gone into the needs of webmasters is beyond belief."***

***- Jay Villaverde,  
[AllNaturalAlternatives.com](http://AllNaturalAlternatives.com)***

"We love LinksManager so much that we don't mind if we have to pay for it every month. It is really fabulous! LinksManager's automated system makes swapping links a snap. As soon as the program tells us our link is active -- CLICK -- instant swap! If the link goes dead -- CLICK-- instant reminder letter. This system was heaven sent for busy people like us. Your customer service is one of the best we've seen. Without our even asking, your helpful staff offered to redesign our links page to match our site for free. Of course we agreed. Now we couldn't be more pleased with the seamlessly integrated results.

Visitors would never know they were visiting a page outside our site without checking

their browser. Now that's what we call service!" - **Cindy Snyder, The Get Paid Project**

"I'm very pleased with LinksManager. Not only has it increased my hits from relevant links, but it has increased sales of my services. My mailing list has grown, so I reach a wider audience for newsletters. Of greatest impact is our ratings on Google search engines. Our key words "free gallery" consistently place us and our sister site Radio Free Gallery in the top 3 rankings. And thanks to LinksManager's link pages, we often get 2 more listings a bit farther down the page for a total of 5 of the top ten spots in Google, in several languages. Similar results come from keywords "authors voices". You are helping us increase brand awareness around the world. Your extra service in upgrading the links page is sure to help even more. Thanks again, very much." - **Fay Zachary, Free Gallery of Author's Voices**

"I have to say, I have never dealt with a company in the 5 years that I have been working on the net that is so responsive, that seems to take so much interest in catering every request, even the small mundane ones. Not just one person, but everyone I have dealt with. Thank you very much, I appreciate it." - **Exclusive Concepts, Inc., HowAmazing.com**

"Your service has saved us countless hours and generated a lot of targeted leads. It is well worth the \$20 a month." - **Dean Harding, SalesVacancies.com**

"Thanks for your efforts. Your assistance is more than a little helpful. You all are doing business the way many companies would like to be able to do business. The extra mile on your part has developed a loyal customer and a vocal promoter of your service. Thanks. Now, I have to check and see if your stock is publicly traded on the market!" - **Em Perriatt, Riveria Maya Today**

"Having spent the past 2 1/2 years to get my website up and running I have had my share of problems, misguidance and financial abuse from various institutions I thought were reliable. My website was in dire need of a marketing strategy and nothing really worked (unless you invest a lot of money in pay per clicks) until I began to utilize LinksManager. Here is a company comprised of professional, courteous, timely and very helpful staff members who still take pride in their business ethics and will not hesitate to assist you in any way possible. My website has gained in link popularity and exposure adding to better search engine rankings. LinkManager's staff will truly go the extra mile to see their customers satisfied, will assist in matters other than their performance requirements and will relay information in laymen's terms that even a novice such as myself could comprehend. If I were asked to rate this company on a scale from 1-10 with ten being the highest, these people would fall off the chart. I recommend LinksManager without hesitation as one of the best there is for your marketing needs." - **Maya Pitri, TantraMagic.com**

"Your staff helped me quickly import my existing database when my previous links host (Linkbank) went under, and got them cosmetically integrated in less than 2 hours! Many thanks for the great service! LinksManager has proven to be so convenient, full-featured and reliable that it has encouraged me to continue building my library larger and larger. My library has already grown by about 30% since I switched to LinksManager, and since I can add more links so quickly and easily, I can work on it whenever I get just a few spare moments, so it will continue to grow." - **Valerie Williams, KnownWorldWeb.com**

"Thank you so much for your prompt response. Your service is so easy and

wonderful.....I can't believe it! Before I found your site I was trying to use Zeus to make my links pages and it was so complicated and frustrating and doesn't offer all the services that your company does without paying the hefty fee for the PRO version. You've turned my Reciprocal Links campaign from an enormous chore to an easy daily task. Thanks!" - **Heather Harper, Spells By Madame**

"Hi. Thank you for your detailed and very professional explanation of the problem I was having understanding LinksManager. I am sure that if all customer support was like you, the World Wide Web would be a much happier place to do business. have a great day." - **Abdel Fahmy, ExitRecycle.com**

"You guys are unreal. Your service is outstanding. We just checked our forhousesales.com search and I reckon it is faster than Google.com. We have over 20,000 links. If you ever need a reference as to the quality and service LinksManager.com provides, we would have no hesitation in recommending your company. Thanks again." - **John Cameron, ForHouseSales.com**

"I consider LinksManager.com an invaluable addition to my website. Besides automating what used to be a tedious process, your company provides outstanding customer service. Within a few days my links pages were seamlessly integrated into my web. My customer care representative even helped me with graphic customization of my home page ... now that's customer service!" - **Dr. Michael Hardee, EndoAsleep.Com**

"I'm very pleased with your customer service. The price of the service is well worth it." - **Chris Spears, Adult website, so links page URL not shown**

"You guys ROCK! I'm impressed. You went above and beyond what I asked for. You guys are one of the few companies I've encountered that have SINCERELY impressed me, by living up to the standards I set for my own business and customer relations. Unfortunately, it seems that people like you have become the exception, not the norm. Well, I for one, place a considerable value upon that, and I will rave about you to others." - **David Burr, Salient Sound Productions**

"Wow, you guys are great!! I love companies like yours that actually help the customers. This is a new concept with me, as I always do what I can with my customers to keep them happy. But in the past, I have not been that lucky dealing with other companies I signed up with for certain services. I ended up getting the shaft a few times and learned quickly to speak up for myself. It is truly a pleasure to do business with such a company as yours!" - **Brenda Heinbuch, Adult website, so links page URL not shown**

"I really love the program. I will be willing to either pay for it every month OR send you enough new customers so I do not have to do so!" - **Rick Montgomery, TakeVegasHome.com**

***"I can't imagine not having LinksManager on my site now. Life just got so much easier and once I got over my fear of trying something new, I found it very easy to use. Plus, the support has been incredible. I won't be operating without this service."***  
- Heather Farquhar,  
HeatherHouseHunter.com

"LinksManager.com is undoubtedly the single best "application service provider" that I have ever used. Joel Lesser (who has posted here about linking and definitely knows his turf) and his team have put together a linking tool that is easy to use, flexible, online, and continues to expand in it's service

capability. A truly impressive example of online application development that addresses the issues from a user's perspective." - **Dirk Johnson, ModelCarHub.com** - from a post to bCentral Daily Digest

"This is probably one of the best put-together webmaster aids I have ever seen." - **John Sykes, 2Hulls.com**

"LinksManager.com is the BEST!!! I sit here shakin' my head again over the fantastic help and service LinksManager.com has offered me in the past week! Thanks to YOU!" - **Sam Judie, Arizona Indian Jewelry**

"Thank you very much, we finally achieved the look and functionality we were looking for. I would not hesitate to recommend your Link Exchange program to anyone. It is very powerful and sophisticated, and your help made it so simple to integrate it within the USAIS.org site." - **John Romano, USAIS.org**

"It's not often I write to a company to thank them for an outstanding product or service. Your company and products have exceeded my expectations, it is so easy to build relations with other sites that it actually fun to do!" - **Christian Wilson, Health-Links.net**

"Ahh, more gratis stuff. I like that. LinkPartners.com is an open-to-all categorized directory of websites which will trade reciprocal links with other sites. Also called link swapping or link exchange, the site only includes quality sites that actively exchange links. LinkPartners.com is designed to make finding sites that exchange links fast and easy. I like that all submitted sites are reviewed by a human editor to ensure quality. There is no cost to register your site and to search for new link partners. Very nice." - **Larry Chase, Web Digest for Marketers**

"I just wanted to say that even though I got off to a rough start I can't imagine not having LinksManager on my site now. Life just got so much easier and once I got over my fear of trying something new, I found it very easy to use. Plus, the Support has been incredible. I'm so glad you offered the 30 day free trial because with so many programs out there (mostly rip offs) I don't know that I would ever have tried LinksManager. Now I won't be without it." - **Heather Farquhar, HeatherHouseHunter.com**

## Internet Articles

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► SitePoint.com

**Review: LinksManager Reciprocal Links Service**

► BizWeb200.com

**"I Coulda Been a Contenda": A lesson that includes a dynamic, new "get links" strategy**

► NewsBureau.com

**New ASP Redefines Internet Reciprocal Linking Strategies**

► RiverCityGroup.com

**Want Your Reciprocal Links Campaign to Grow? Check Your Drawers!**

► BCentral ListBot.com

**Link Directory Management Programs**

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